

**CONFIDENTIAL**

5 April 1956

**MEMORANDUM FOR:** Acting Chief, Regulations Control Staff

**SUBJECT :** Proposed R 20-130: Employment Policy and Procedure under Executive Order 10590

This Office had an earlier opportunity to examine a draft of this regulation and forwarded our comments to the CIA Employment Policy Officer in a memorandum dated 2 March 1956. Several suggestions were made which have been adopted in the present draft. There are two additional suggestions which were not adopted and which we would like to repeat here:

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a. Paragraph 3.a. should conform with the report of the President's Committee, establishing regulations under the Executive Order, which provides forty-five days for the filing of a complaint involving specific action and further provides, "A complaint will not be subject to these specific time limits if it is concerned with a continuing discriminatory practice." We suggest that this regulation agree with the general Government practice as stated above, because of the well-established Agency policy that in personnel matters we will generally comply with Government practices unless some exception is justified by our peculiar functions. No such justification is apparent here. Discussion with [redacted] indicates that the thirty-day period appearing in the draft was dictated primarily by considerations of administrative convenience.

b. We note that distribution to all employees is recommended. Although all employees should see this regulation, as is true of almost all regulations, we question the distribution of personal copies of any regulation, including this one. Perhaps the intended purpose could be served by a brief notice distributed to all employees calling their attention to this regulation and directing them to read it.

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Distribution:

Orig. & 1 - addresses  
1 - subject w/basic  
1 - signer  
1 - OGC chrono

[redacted]  
Assistant General Counsel

OGC [redacted]